

Environmental Protection Ag€

2200 Churchill Road, Springfield, Illinois 627(

217/782~2113

Permit Expiration Date: December 31, 1982

EPA Region 5 Records C

355920

Application No.: 72110194

I.D. No.: 031600AHO LTHO PLNT

Received: October 29, 1980 Operation of: Lithographing

Location: 11541 South Champlain Avenue, Chicago, Illinois

January 23, 1981

Sherwin Williams Company 11541 South Champlain Avenue Chicago, Illinois 60628

Attention: J. E. Thornton

Gentlemen:

Permit is hereby granted to operate the above-referenced equipment.

This permit is subject to the following conditions:

- 1. Standard conditions attached hereto and incorporated herein by reference.
- 2. Permit is granted to construct a bypass around the afterburner incinerators.
- 3. The use of the bypass is subject to the following conditions:
 - a. If the coating being used contains volatile organic material in excess of Rule 205(n)(1)(B), the bypass may only be used between November 1 and April 1 as provided by Rule 205(r).
 - b. The bypass may be used at any time for testing coatings that meet the provisions of Rule 205(n)(1)(B).
- 4. The Agency has determined that the use of a bypass around an afterburner in accordance with Rule 205(r) cannot, by itself, subject an existing coating line to the nonattainment area rules (Rules For Issuance Of Permits To New Or Modified Air Pollution Sources Affecting Nenattainment Areas) because it does not result in an increase in the uncontrolled emissions from the line. This finding would not apply to a "new" coating line which has been constructed under the provisions of these rules, as use of an afterburner bypass would be considered a revision of the initial construction permit.

Please note that the increases in allowable emissions which will result, will be considered together with increases in emissions from later projects to determine applicability of these rules in the future, as provided by the nonattainment area rules.

5. Your Compliance Plan (dated January 1, 1980 with follow-up letters dated October 14 and December 2, 1980) is acceptable to the Agency. High solid coatings may be tested as desired. You need not submit progress reports as required by Rule 205(m)(1)(B) since you are already in compliance using the alternative compliance method of Rule 205(n)(2)(A).

If you have any questions concerning this permit, please contact Dan Punzak at 217/782-2113.

Very truly yours,

Bharat Mathur, P.E.

Manager, Permit Section

Division of Air Pollution Control

BM:DGP:sh/1884H/12-13

NUMBER: 3

WITHHELD DOCUMENT





The Sherwin-Williams Company Container Division 5325 South 9th Avenue Countryside, Illinois 60525 Phone (312) 482-9393 RECEIVED

DEC 05 1980

REPAIDAPCISEFUD

December 2, 1980

Mr. Dan Punzak Illinois EPA - Permit Section 2200 Churchill Rd. Springfield IL 62706

Dear Mr. Punzak:

Re: Sherwin-Williams - Chicago Container Plant

Incinerator By-Passes

Permit No. 02110196 I.D. No. 031600 AHO

In a recent conversation you asked us to explain how we would use the seasonal operation of our incinerators, as it applies to Rule 205 (r) and what type of modifications we would make to the lithograph equipment.

Seasonal Operation of Incinerators

Our request for incinerator by-passes was mainly for evaluation of materials that would comply with Rule 205 (n)(1)(B). These compliance materials (VOC under 2.8 lbs/gal) would be evaluated not only for processability but also for odor nuisances and visible emissions. If our plan did not succeed in obtaining the necessary compliance materials in time to meet Rule 205 (n)(1)(B), we would then option to operate under Rule 205 (r) and 205 (n)(2)(A) while continuing to evaluate compliance materials. Rule 205 (r) would allow us to operate without an incinerator from November 1 of any year to April 1 of the following year.

These dates were established by an USEPA study; "Ozone/Oxidant NAAQS Violations for November, 1976 - March 1977," published July 26, 1977, which concluded that potential ozone violations did not exist below temperatures of 65°F. Therefore, not operating the natural gas incinerators has an energy saving benefit.

We consumed over 35 separate coatings in a year equivalent to over 240,000 gallons of material. Five of these coatings make up approximately 90% of the material consumed. Using the seasonal operation of incinerator paragraph, we would not alter our production runs (summer vs. winter, since we operate to meet delivery schedules.

We also would not use compliance materials in the summer and non-compliance materials in the winter.

Lithograph Equipment Modification

Based on the type of coating materials chosen, equipment modifications may include special application rolls, preapplication heaters, pumps, reservoirs, oven-controllers, electrical interlocking system for by-pass to incinerator, a capture system to direct fugitive emissions to the oven, etc.

We appreciate your comments and assistance in this matter.

Cordially,

E. P. Obradovich

Manager, Product Development

EPO:G



The Sherwin-Williams Company

Container Division 5325 South 9th Avenue Countryside, Illinois 60525 Phone (312) 482-9393

November 10, 1980

Mr. Christopher Romaine
Illinois Environmental Protection Agency
Permit Section
2200 Churchill Road
Springfield IL 62706

NOV 121980

Dear Chris:

Regarding your memo that you have no record of receiving the compliance plan for The Sherwin-Williams Chicago Container Plant (Permit No. 02110196 and/or 02110194, I.D. No.031600 AHO), we are enclosing a copy of the original, which was sent in December 1979. We are also including a copy of the request to install by-passes on the incinerators.

We would appreciate your assistance in this matter.

Emil P. Obradovich

Manager, Product Development

EPO:G enclosure



The Sherwin-Williams Company Container Division 5325 South 9th Avenue Countryside, Illinois 60525 Phone (312) 482-9393

October 14, 1980

Mr. Dan Punzak
Illinois EPA - Permit Section
2200 Churchill Rd.
Springfield IL 62706

Dear Mr. Punzak:

Re: Incinerator By-Passes Permit No. 02110196 I.D. No. 031600 AHO

The Sherwin-Williams Company operates a container manufacturing plant at 11541 S. Champlain Avenue, Chicago, Illinois 60628. We have been manufacturing quart and gallon round cans - the traditional paint can, at this facility since 1921, and we also apply can coatings on flat sheet stock for both interiors and exteriors of cans.

H : 25

We have two lithograph presses and one coating line. The lithograph presses apply inks and over-varnishes, while the coating line applies exterior basecoats and interior coatings. Presently, we have two incinerators - one for the litho presses and one for the coating lines. These incinerators were installed in 1972 without by-passes. Everything, therefore, must go through the incinerator even though all of our coatings and varnishes are in compliance with Rule 205 (f) of the State of Illinois Air Pollution Control Regulations. We must operate the incinerator because of processability rather than meeting any air pollution regulations.

We are requesting permission to install by-passes to both our incinerators for the following reasons:

1. SIP regarding Emissions of Volatile Organic Material, R 78-3-4; as written in Rule 205 (r)(1)(B) effective for final compliance on December 31, 1982. In order to achieve environmental compliance and minimize energy waste, we must evaluate compliance coatings. We cannot effectively have plant evaluation of high solid or water-borne materials without a by-pass to the incinerators. We have evaluated numerous compliance systems in our laboratory and have had plant evaluations at all of our other can manufacturing facilities.

We presently have an exterior overvarnish high solid compliance material 1.3 lbs. VOC/gal, undergoing commercial trial that may be applicable to this operation. However, we cannot evaluate it unless we install a by-pass.

2. Seasonal Operation of Incinerators, Rule 205 (r).

If we do not achieve compliance by 1982 of all our coatings, over 35 separate formulations were consumed last year. We would like to comply with Rule 205 (r) by not operating our incinerators during the period of November 1 of any year to April 1,of the following year.

The Sherwin-Williams Company has always been an environmentally aware company. We are seriously complying with existing and new environmental requirements. We also believe that the spirit of the SIP on organic emissions is one that would be technologically forcing and not one that is energy intensive and wasteful.

We, therefore, are requesting your approval to by-pass the incinerators at the Sherwin-Williams Company container manufacturing operations at 1154 S. Champlain Avenue, Chicago, Illinois 60628. This matter has been discussed with Mr. Karl Franson from the Maywood Office.

JEGN & VON

Yours truly,

EPO:G

Emil P. Obradovich Manager, Product Development

cc: Mr. Karl Franson
Illinois EPA
Suite 1205, Intercontinental Center
1701 lst Avenue
Maywood IL 60153

ILLINOIS EPA

VOLATILE ORGANIC MATERIAL EMISSION COMPLIANCE PROGRAM

for .

CHICAGO, ILLINOIS CONTAINER MANUFACTURING OPERATIONS

THE SHERWIN-WILLIAMS CO. 11541 S. Champlain Avenue Chicago, Illinois 60628

January 1, 1980

D. R. Tamhane, Plant Manager

Prepared by:

THE SHERWIN-WILLIAMS CONTAINER DIV. Research & Development Department

J. H. Groves, Director

George W. Scalamera Vice President, and Director of Manufacturing

Emil P. Obradovich Project Leader

FOREWORD

This folder contains our Compliance Program as established by the Illinois Environmental Protection Agency; In the matter of: Emissions of Volatile Organic Material, R78-3,-4. As written in Rule 104 (b) (1)-(2) - Contents of Compliance Programs & Project Completion Schedules for Compliance with Rule 205 (n) (2) (A).

The Sherwin-Williams Company has always been an environmentally aware company. We, therefore, are seriously complying with new and existing environmental requirements.

CONTAINER DIVISION - RESEARCH & DEVELOPMENT

INTRODUCTION:

The Sherwin-Williams Company container plant has been operating out of Chicago, Illinois since 1921. At this plant we produce quart and gallon round cans, the traditional paint can. We also manufacture quart and pint oblong (rectangular) cans, which will be phased out in 1980.

This plant is a multi-shift operation which has 260 employees with a total annual salary of \$4.6 million.

MANUFACTURING AREAS AFFECTED BY RULE 205 (a):

The affected manufacturing operations are sited in Rule 205 (n)(1)(B) concerning hydrocarbon emissions from the surface coating of cans. The designated plant departments affected are:

		Lbs./Gal.
Lithography	Sheet Basecoat & Overvarnish	2.8
	Exterior Basecoat & Overvarnish	2.8
Press	End Sealing Compound Coat	3.7

PRESENT STATUS:

Lithography -

In 1978 the Chicago Plant consumed over 35 separate coatings, equivalent to over 24,500 gallons of material. Approximately 8,600 gallons were used for can interiors. One coating accounted for 33% of the total gallonage and 94% of all interior coatings. This coating has a VOC of 4.95 lbs./gal.

The exterior can coating accounted for approximately 15,900 gallons; 8,400 gallons exterior basecoat and 7,500 gallons overvarnish. An exterior white basecoat with a VOC 4.2 lbs./gal., accounted for 40% of all exterior coatings. Another white exterior basecoat with a VOC of 3.2 lbs./gal. accounted for 13% of all exterior coatings. Two exterior overvarnishes with VOC's of 4.3 and 4.6 lbs./gal. individually, accounted for 20% of all exterior coatings.

Incineration is presently in use and has been since 1972. At the time, it was installed to meet the emission standards that were effected April 14, 1972, PCB R71-23, Rule 205 f.

Present Status: Lithography contd.

Presently we are using exempt formulas according to Rule 205 f, however we have no means of by-passing the incinerator, so we continue to incinerate.

Press Department -

In fabricating general line cans, end sealing compounds are used in the bottom and top doubleseams. All end sealing compounds presently consumed are waterborne systems, having VOC's of less than 0.1 lbs./gal. In 1978 we consumed 65,000 gallons of end compound on 14 round press lines and 3 oblong press lines.

COMPLIANCE MATERIAL AVAILABILITY:

Lithography -

To our knowledge there are no compliance (2.8 lbs./gal VOC) materials commercially available for our interior applications. Several experimental exterior whites and varnishes are being offered by vendors as compliance coatings. However, since we are incinerating, we would be in compliance with Rule 205 (a)(2)(A) - The alternative is compliance by an afterburner system.

Press Department -

In the Press Department the material affected is the end sealing compound with a requirement of 3.7 lbs./gal. VOC. The end sealing compounds that we presently use have a VOC of less than 0.1 lbs./gal. We, therefore, are currently in compliance with Rule 205 (n)(1)(B)(vi).

ECONOMICS OF INCINERATION:

We would like to take this opportunity to present some of our operational costs of our afterburners. In 1978 we spent \$42,072 for natural gas. Another \$20,000 was spent on general maintenance costs which included \$14,000 for new insulation, bringing our total expenditure to \$62,072.

COMPLIANCE PROGRAM BY INCINERATION: COMPLIANCE MATERIALS

Lithography -

We have I coating line and 2 lithograph press lines, followed by trailing coaters where we are connected into 2 afterburners. Looking at 92% of our overall 1978 usage which covers 5 coating materials, we used 99,586 lbs. of VOC.

If we used material rated as 2.8 lbs./gal. we would have consumed 63,979 lbs. of VOC. Since we are incinerating, we would be in compliance with Rule 205 (n)(2)(A).

Compliance Program by Incineration: Compliance Materials contd.

Press Department -

In the Press Department we have 14 round press lines and 3 oblong press lines. We consumed 65,000 gallons of end compound in 1978, which has less than 0.1 lbs. VOC/gal. We would be allowed 3.7 lbs. VOC/gal. or in 1978 240,500 lbs. VOC. We are therefore in compliance with Rule 205 (n)(1)(B)(vi) by at least 233,500 lbs. of VOC less than legislated.

A process flow sheet is attached as Appendix A & B. All data provided was obtained through our normal accounting records of material purchased, used and inventoried. The pounds VOC/gal. are based on ASTM D-2369-73.

THE SHERWIN-WILLIAMS COMPANY CHICAGO, ILLINOIS COMPLIANCE PROGRAM SCHEDULE

Action	Completion Date	Comments
Award contract for modification	7/1/80	Modifications may not be required.
Modification completed	6/1/82	
In full compliance	10/1/82	

Emission Control Equipment presently in place and functioning since 1972. APC 202 is attached.

NEW DEVELOPMENTS:

We have not included seasonal operation of our afterburners as we do not have the engineering or economic studies completed for a by-pass system. If it is determined to install such a system, we would request a revision under Rule 104 (d).

As technology extends itself into developing compliance interior and exterior coatings, we will evaluate them until we have proven systems. We would then request a revision under Rule 104 (d) to operate without the afterburners.

George W. Scalamera, Vice President, and

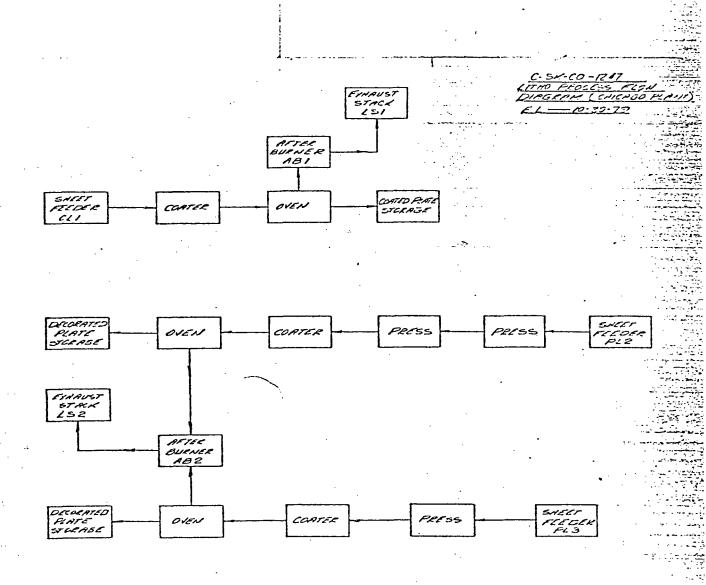
Director of Manufacturing

Emil P. Obradovich

APPENDIX A

THE SHERWIN-WILLIAMS CO. CHICAGO CONTAINER PLANT

LITHOGRAPH DEPARTMENT PROCESS FLOW

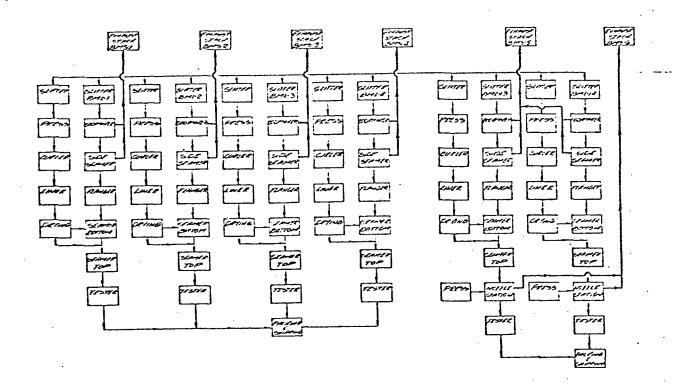


APPENDIX B

THE SHERWIN WILLIAMS CO. CHICAGO CONTAINER PLANT

ASSEMBLY DEPARTMENTS

PSA CO-1210 ESSEM PROCESS PO DIMERCAM CONCESS



20-34-50-171



STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF AIR POLLUTION CONTROL 2200 CHURCHILL ROAD SPRINGFIELD, ILLINOIS 62706

COMPLIANCE PROGRAM AND PROJECT COMPLETION SCHEDULE NAME OF EQUIPMENT TO BE CONSTRUCTED OR MODIFIED Surface Can Coating Lines	FOR AGENCY USE ONLY I. D. NO. PERMIT NO. DATE (A)							
la. NAME OF OWNER: Sherwin-Williams Company 1b. STREET ADDRESS OF OWNER: 101 Prospect Av. N.W. 1c. CITY OF OWNER: Cleveland 1d. STATE OF OWNER: Ohio 1e. ZIP CODE: 44115	2a. NAME OF OPERATOR: Sherwin-Williams Co. 2b. Street Address of Operator: 11541 S. Champlain Av. 2c. CITY OF OPERATOR: Chicago 2d. STATE OF OPERATOR: 2e. ZIP CODE: IL 60628							
3a. NAME OF CORPORATE DIVISION OR PLANT: Container Division 3c. CITY OF EMISSION SOURCE: Chicago 4. ALL CORRESPONDENCE TO: (NAME OF INDIVIDUAL) G.W.Scalamera 6. ADDRESS FOR CORRESPONDENCE: OWNER DOPERATOR EMISSION SOURCE	3b. STREET ADDRESS OF EMISSION SOURCE: 11541 S. Champlain Av. 3e. TOWNSHIP: 3f. COUNTY: Cook 60628 5. TELEPHONE NUMBER FOR AGENCY TO CALL: 312 482 9393							
7. THE UNDERSIGNED HEREBY CERTIFIES THAT THE STATEMENTS CONTAINED HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THI AUTHORIZED SIGNATURE(S): BY SIGNATURE George W. Scalamera TYPED OR PRINTED NAME OF SIGNER Vice President, and Director of Manufacturing TITLE OF SIGNER (A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT OF ANY EQUIPMENT TO BE CONSTRUCTED OR MODIFIED PURSUANT TO THIS FORM (B) THIS MUST BE SIGNED IN ACCORDANCE WITH PCB REGS., CHAPTER 2, PART	BY SIGNATURE 12-18-79 Dilip R. Tamhane TYPED OR PRINTED NAME OF SIGNER Plant Manager TITLE OF SIGNER T THE COMPLIANCE PROGRAM. CLEARLY IDENTIFY THE GENERIC NAME PLAN. T 1, RULE 104(c)(2). IF THE PERSON SIGNING							
THE COMPLIANCE PROGRAM AND PROJECT COMPLETION SCHEDULE IS AUTHOR SUCH AUTHORIZATION WILL USUALLY COMPLY WITH THE BEFORE-MENTIONED	IZED TO DO SO BY A RESOLUTION OF THE BOARD OF DIRECTORS.							

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NOTE: THE TIME BETWEEN THE SUBMISSION OF THIS FORM AND THE INITIAL EVENT LISTED IN ITEM 10 SHALL NOT EXCEED 6 MONTHS. THE TIME BETWEEN ANY TWO CONSECUTIVE EVENTS LISTED IN ITEM 10 SHALL NOT EXCEED 6 MONTHS. *THE FINAL COMPLIANCE DATE SHALL BE NO LATER THAN THE APPLICABLE DATE SET FORTH IN PCB REGS., CHAPTER 2: AIR POLLUTION.																																
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* Emission Control Equipment presently in place and functioning since 1972.

Program designed for possible modification. Modifications may not be required.

NUMBER:

WITHHELD DOCUMENT

Don P



The Sherwin-Williams Company
Container Division

Container Division 5325 South 9th Avenue Countryside, Illinois 60525 Phone (312) 482-9393

October 14, 1980

RECEIVED

METAL CONTAINERS

OCT 29 1980

IEPA-DAPC-SPFLD

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Mr. Dan Punzak
Illinois EPA - Permit Section
2200 Churchill Rd.
Springfield IL 62706

Dear Mr. Punzak:

Re: Incinerator By-Passes
Permit No. 0211019# I.D. No. 031600 AHO

The Sherwin-Williams Company operates a container manufacturing plant at 11541 S. Champlain Avenue, Chicago, Illinois 60628. We have been manufacturing quart and gallon round cans - the traditional paint can, at this facility since 1921, and we also apply can coatings on flat sheet stock for both interiors and exteriors of cans.

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We, therefore, are requesting your approval to by-pass the incinerators at the Sherwin-Williams Company container manufacturing operations at 1154 S. Champlain Avenue, Chicago, Illinois 60628. This matter has been discussed with Mr. Karl Franson from the Maywood Office.

Yours truly,

Emil P. Obradovich

Manager, Product Development

EPO:G

: Mr. Karl Franson Illinois EPA Suite 1205, Intercontinental Center 1701 lst Avenue Maywood IL 60153

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